

SECTION 7: DRINKING WATER QUALITY COMPLAINTS



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Section 7: Drinking water quality complaints

Summary of Section 7

- ◆ Describes the importance of consumers' complaints about drinking water quality and the need to investigate and solve them promptly.
- ◆ Sets out the procedures that Water Services Authorities (WSAs) should have in place to investigate the cause of complaints, to determine any remedial action that might be necessary, for liaising with the consumers on the progress with the investigation and for giving consumers advice on the action they can take to minimise any risk to their health.
- ◆ Describes the circumstances when WSAs must consult and agree with the Health Service Executive (the HSE) on whether there is a potential danger to human health and what WSAs must do if there is such a danger.
- ◆ Describes the circumstances when WSAs must inform the Environment Protection Agency (the EPA) about consumers' complaints about drinking water quality.

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1. Introduction

1.1 | Water Services Authorities (WSAs) will be aware that drinking water quality is very important to consumers. If something has gone wrong with the water supply it could present a risk to consumers' health or affect the appearance, taste or odour of the supply. Therefore complaints about drinking water quality received from consumers should be investigated promptly by the WSA and the results of the investigation given quickly to the complainants. If the cause of the complaint is a problem with the quality of the water supplied by the WSA, then the WSA must take prompt action to remedy the problem. If the cause of the complaint is the condition of the domestic distribution system (the pipe work and fittings) within the premises, the WSA must give the

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complainant advice on how to resolve the problem. Complaints may be received from consumers by telephone, in writing by letter, fax or e-mail or in person. WSAs should have in place comprehensive written procedures for dealing with complaints about the quality of public drinking water supplies.

1.2 | The Environment Protection Agency (the EPA) recommends that all complaints are directed to the WSA in the first instance and that the WSA should liaise with the complainant to address the cause of the complaint whenever possible. When the EPA receives a complaint about drinking water quality that has not been reported previously to the WSA, the EPA will advise the complainant to contact the WSA directly and the EPA will also refer the complaint to the WSA for investigation. However, where the complaint has already been reported to the WSA and the WSA does not appear to have dealt with the complaint in a satisfactory matter, the EPA may request the WSA to carry out an investigation (or a further investigation) and to report the results to the EPA. The EPA may take enforcement action if it appears necessary.

2. Procedures for dealing with drinking water quality complaints

2.1 | The WSA's written procedures for dealing with complaints about the quality of public drinking water supplies should include as a minimum:

- ◆ a system of recording the receipt of telephone, written and personal complaints and for collation those complaints;
- ◆ a procedure for assigning immediately the management of the investigation of the complaint to one person (usually a member of the WSA's scientific or engineering staff) who will co-ordinate the activities of all personnel involved in the complaint. This person should be capable of determining the nature of the problem, determining appropriate investigations to ascertain the cause and assessing whether there could be wider implications;
- ◆ a procedure requiring the assigned person to contact the complainant and explain what the WSA is doing and when the complainant can expect a response. This person should keep the complainant informed, particularly if there is any delay;
- ◆ guidance on the investigations that should be carried out which could included as appropriate:

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- reviewing the recent operation of the water treatment works, service reservoir and the distribution network to determine whether any action may have contributed to the water quality problem;
- reviewing the results of recent compliance and operational samples from relevant sampling locations;
- taking and analysing samples for appropriate parameters from appropriate locations including the complainants premises; and
- analysing any samples taken by the complainant for appropriate parameters, provided the samples are clearly not compromised (the complainant may have taken a sample in a container that obviously contaminated the sample);
- ◆ a procedure for receiving and assessing the results of the investigation and if necessary discussing them with laboratory and operational staff;
- ◆ a system initiation of any necessary action by the WSA:
 - taking any appropriate remedial action when the complaint has been caused by the WSA's operations; and
 - giving advice to the complainant on the actions he/she should take when the investigation has established that the cause is associated with the condition of his/her pipe work and fittings;
- ◆ a system for reporting the outcome to the complainant as quickly as possible in simple terms (avoid the use of scientific or engineering language that the complainant will not understand);
- ◆ a system for reviewing from time to time the procedures and modifying them if necessary; and
- ◆ a system for reviewing periodically all complaints by number, type and location to determine whether there are particular difficulties with some aspect of the WSA's operations.

2.2 | The WSA should also have arrangements for checking that the complainant is satisfied with the WSA's investigation, explanation of the cause and the action taken. The complainant may not be satisfied and when this occurs the complainant should

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have the opportunity of the matter being referred to a senior person in the WSA. This person should review the WSA's investigation and handling of the initial complaint and, if necessary, initiate further investigations. The outcome of the review should be reported to the complainant as quickly as possible. If the complainant is still not satisfied, the WSA should refer the complainant to the EPA for investigation of the WSA's actions. Formal complaints can also be made to the EPA in accordance with the Environmental Enforcement Network National Complaints Procedure.

2.3 | The samples taken as part of the investigation into complaints are not **compliance** samples nor can they be regarded as **operational** samples because they may not be representative of the quality of water normally supplied. However the WSA should keep adequate records of these investigative samples and the results of any analysis so that they can be provided to, and inspected by, the EPA on request.

2.4 | Sometimes, particularly when the cause of the complaint is the WSAs operations, there may be several complaints of the same nature from consumers in different premises in the supply zone. If there are a sufficient number of serious complaints, the situation may be regarded as an incident, or even an emergency, affecting drinking water quality. In these circumstances the WSA should follow the procedures set out in section 8 of this handbook.

3. Liaison with the Health Services Executive (the HSE)

3.1 | If the investigation of the complaint finds that there has been a non-compliance with a standard in tables A or B or an indicator parameter value in table C of part 1 of the schedule to the Regulations, the WSA must consult and agree with the HSE on whether the non-compliance is a potential danger to human health. If the WSA has not detected a non-compliance but is concerned that there may be a health risk (for example because some other substance is present) it should also consult the HSE. If the HSE considers that there is a potential danger to human health, then the WSA (with the HSE's agreement) must:

prohibit or restrict the use of the supply and take urgent remedial action when the problem is caused by the WSA's operations; or

provide advice to the complainant about the action he/she can take to minimise the risk to all the consumers in the premises when the problem is caused by the condition of the domestic distribution system (pipe work and fittings) within the premises.

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3.2 | Detailed advice on consulting the HSE about the protection of human health and giving advice to consumers and on taking remedial action is given in section 6 of this handbook.

4. Reporting complaints to the EPA

4.1 | If the investigation of the complaint finds that there has been a non-compliance with a standard in tables A or B or an indicator parameter value in table C of part 1 of the schedule to the Regulations, the WSA must notify the EPA using the form at Appendix 1 of section 6 of this handbook. The WSA will be required to take remedial action under the provisions of regulation 10 and may be directed to do so by the EPA. Further guidance on the procedures for remedial action programmes is given in section 6 of this handbook. If the WSA, in consultation and agreement with the HSE, has to prohibit the supply of water or restrict its use, it must notify the EPA.

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